

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2023-388-E**

IN RE:)	
)	
Duke Energy Carolinas, LLC's Application)	SOUTH CAROLINA DEPARTMENT
for Authority to Adjust and Increase Its)	OF CONSUMER AFFAIRS FIRST SET
Electric Rates and Charges)	OF INTERROGATORIES AND
)	REQUESTS FOR PRODUCTION TO
)	DUKE ENERGY CAROLINAS, LLC.

Pursuant to S.C. Code Ann. Regs. 103-833, the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this First Set of Interrogatories and Requests for Production to Duke Energy Carolinas, LLC. ("DEC" or "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e), and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available.

INSTRUCTIONS

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.
4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.
5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.
6. Each request should be reproduced at the beginning of the response thereto.
7. If the response to any Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.
8. This request shall be deemed continuing so as to require DEC to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.
9. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by

author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

10. If a refusal to respond to a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each request on the basis of the entire knowledge of DEC, including information in the possession of DEC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

12. If any request cannot be answered in full, respond to the extent possible and specify the reasons for DEC 's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "Company" mean DEC or any of its affiliates, officers, directors, employees, attorneys, or agents.

2. "Application" is defined as the application filed by DEC on January 4, 2024 or as otherwise revised.

3. "Company" and "DEC" are defined as DEC, its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.

4. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes. The terms include drafts, revisions, or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

5. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic, or otherwise.

6. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter,

memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no longer is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

DOCUMENT AND INFORMATION REQUESTS

- 1-1 Please provide a copy of all questions, discovery, or information requests submitted to the Company by other parties, including the Office of Regulatory Staff (“ORS”), and provide the Company’s responses, including responsive documents or materials, to such requests.
- 1-2 Please provide a copy of all questions, discovery, or information requests submitted by the Company to other parties and provide the parties’ responses, including responsive documents or materials, to such requests.
- 1-3 Provide all workpapers, reports and source documents that support or form the basis for the Company’s Application, testimony, and exhibits. Please provide the requested documents in electronic form with any applicable spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
- 1-4 Please provide the names and addresses of any person whom the Company intends to use as a witness at the hearing in this case and identify with specificity the issues to be addressed by such witnesses and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.
- 1-5 For each person known to be a witness concerning the facts of the case or the Application, provide a copy of any written or recorded statements taken from such witnesses.
- 1-6 Please provide the curriculum vitae or resume showing all qualifications, employment history, previous witness experience, and publications of all witnesses whom the Company intends to use as a witness at the hearing in this case.
- 1-7 Please provide a copy of Mr. Coyne’s exhibits from his direct testimony in live Excel format with all formulas intact.
- 1-8 Please provide a copy of all sources referenced in Mr. Coyne’s direct testimony.
- 1-9 Please provide the actual balance of short-term debt used by Duke Energy Carolinas, LLC for each month (or most frequently available) from January 1, 2016, to the most currently available in live Excel format.
- 1-10 Please provide the total actual balance of CWIP broken down into CWIP earning AFUDC and CWIP not earning AFUDC for Duke Energy Carolinas, LLC for each month (or most frequently available) from January 1, 2016, to the most currently available.

- 1-11 Please provide in live Excel format the monthly (or most frequently available) balance sheet and income statements for Duke Energy Carolinas, LLC for each year from January 1, 2016, to the most currently available.
- 1-12 Please provide in live Excel format the monthly (or most frequently available) balance sheet and income statements for Duke Energy Corporation for each year from January 1, 2016, to the most currently available.
- 1-13 Please provide Duke Energy Carolinas, LLC's electric sales to residential, commercial, and industrial customers for each month (or most frequently available) from January 1, 2018, to the most currently available.
- 1-14 Reference page 22, Figure 5 of Mr. Coyne's direct testimony, please provide the percentage of operating income of each of the 17 companies in Mr. Coyne's proxy group derived from regulated electric operations.
- 1-15 Please provide a copy of all the major bond rating agency reports that cover Duke Energy Corporation and Duke Energy Carolinas, LLC that were issued from January 1, 2018, to the most currently available.
- 1-16 Please list all debt and equity raised by Duke Energy Corporation and Duke Energy Carolinas, LLC since January 1, 2015 to the most currently available. For bonds, please provide the CUSIP number for all securities raised over this time.

Signature on Following Page

S.C. DEPARTMENT OF CONSUMER AFFAIRS

A handwritten signature in blue ink, appearing to read "Roger Hall", is positioned above a horizontal line.

Roger Hall, Esq. (Deputy Consumer Advocate)
Carri Grube Lybarker, Esq. (Consumer Advocate)
Jacob D. Edwards, Esq. (Assistant Consumer Advocate)
P.O. Box 5757
Columbia, South Carolina 29250-5757
(803) 734-4200

January 16, 2024
Columbia, South Carolina

CERTIFICATE OF SERVICE

I, Jake Edwards, hereby certify that the foregoing document was served by electronic mail on all parties at the addresses listed in the Commission's official service list for Docket 2023-388-E on January 16, 2024.

/s/ Jake Edwards

Jake Edwards, Esq.